



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY

NEW YORK, NY 10007-1866

DEC 13 2014

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

**Article Number: 7005 3110 0000 5964 3570**

Mr. Pat Martimucci, Plant Manger  
Nassau Chromium Plating CO., INC  
112-122 Second Street  
Mineola, New York 11501

RE: Request for Information (RFI) Pursuant to Section 308 of the Clean Water Act  
Nassau Chromium Plating CO., INC – (NYU006080)  
Docket No. CWA-IR-15-006

Dear Mr. Martimucci:

The United States Environmental Protection Agency (EPA) is charged with the protection of human health and the environment under the Clean Water Act (CWA or Act), 33 U.S.C. §§ 1251 *et seq.* Section 308(a) of the CWA, 33 U.S.C. § 1318(a), provides that whenever it is necessary to carry out the objectives of the CWA, including determining whether or not a person/agency is in violation of Section 301 of the CWA, 33 U.S.C. § 1311, the EPA shall require the submission of any information reasonably necessary to make such a determination. Under the authority of Section 308 of the CWA, EPA may require the submission of information necessary to assess the compliance status of any facility and its related appurtenances.

You are hereby required, pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a), to submit to EPA in writing with accompanying photographs and documentation the following information regarding the subject Facility no later than **thirty (30) calendar days** of receipt of this RFI:

1. A detailed drainage description of the catch basin located in the parking lot on the western side of the facility;
2. Engineering calculations or other appropriate methods that demonstrate definitively that a discharge would or would not occur from the facility in the event of a heavy rain storm, up to and including a 100-year storm into waters of the United States;
3. The actions you have taken or will take to address the Potential Violation and Area of Concern specified in the enclosed Inspection Report.

Please note that if you do not obtain coverage under the MSGP and a storm event less than or equal to a 100-year storm event occurs that results in a discharge of stormwater from the Facility to a water of the U.S. via a point source, you will be in violation of the Clean Water Act and subject to civil penalties.

All information required to be submitted by this Request for Information shall be sent by certified mail or its equivalent to the following address:

Doughlas McKenna, Chief  
Water Compliance Branch  
Division of Enforcement and Compliance Assistance  
290 Broadway, 20<sup>th</sup> Floor  
New York, NY 10007-1866

Any documents to be submitted by you must be sent by certified mail or its equivalent and shall be signed by an authorized representative of the respective entity (see 40 C.F.R. § 122.22), and shall include the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitted false information, including the possibility of fine and imprisonment for knowing violations."

Failure to provide the required information may subject the facility to civil/criminal penalties pursuant to Section 309 of the CWA. Failure to comply with the RFI shall also subject the facility to ineligibility for participation in work associated with Federal contracts, grants or loans.

Enclosed is a copy of the inspection report detailing EPA's findings from the September 2, 2014 inspection at the Nassau Chromium Plating CO., INC.

If you have any questions regarding this Request for Information or the enclosed Inspection Report, please feel free to contact Chris Mecozzi of my staff via phone at (212) 637-4262 or via email at [mecozzi.christopher@epa.gov](mailto:mecozzi.christopher@epa.gov).

Sincerely,



Doughlas McKenna, Chief  
Water Compliance Branch

Enclosure

cc: Joseph DiMura, P.E, Director, Bureau of Water Compliance Programs, NYSDEC





United States Environmental Protection Agency  
Washington, D.C. 20460  
**Water Compliance Inspection Report**

Form Approved.  
OMB No. 2040-0057

**Section A: National Data System Coding (i.e., PCS)**

Transaction Code		NPDES		yr/mo/day		Inspection Type		Inspector		Fac Type	
1 N	2 5	3 N Y U	0 0 6 0 8 0 11	12 1 4 0 9 0 2 17	18 ~	19 R	20 2				
Remarks											
21											
Inspection Work Days		Facility Self-Monitoring Evaluation Rating				B1		QA		-----Reserved-----	
67 1	69	70 5	71	72	73	74	75				80

**Section B: Facility Data**

Name and Location of Facility Inspected (for industrial users discharging to POTW, also include POTW name and NPDES permit number)		Entry Time/Date	Permit Effective Date
Nassau Chromium Plating CO., INC 112-122 Second Street Mineola, N.Y. 11501		12:45 PM 9/2/14	N/A
		Exit Time/Date	Permit Expiration Date
		1:32 PM 9/2/14	N/A
Name(s) of On-site Representative(s)/Title(s)/Phone and Fax Number(s)		Other Facility Data	
Pat Martimucci Plant Manager (516) 746-6666		SIC Code:3471  Lat: 40.742925, Long: -73.635961	
Name, Address of Responsible Official/Title/Phone and Fax Number(s)			
Pat Martimucci Plant Manager (516) 746-6666			
		Contacted	
		X Yes No	

**Section C: Areas Evaluated During Inspection (Check only those areas evaluated)**

<input checked="" type="checkbox"/> Permit	<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> CSO/SSO (Sewer Overflow)
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Pollution Prevention
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> Multimedia
<input type="checkbox"/> Effluent/Receiving Water	<input type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water	<input type="checkbox"/> Other:

**Section D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists as necessary)**

See Attached Report.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Chris Mecozzi, Environmental Engineer	EPA/DECA-WCB/(212) 637-4262 FAX:x3953	12/17/14
Signature of Management Q/A Reviewer	Agency/Office/Phone and Fax Numbers	Date
Justine Modigliani P.E., Compliance Section Chief	EPA/DECA-WCB/(212) 637-4268 FAX:x3953	12/17/14

## **Section D: Summary of Findings/Comments**

### **INTRODUCTION**

On September 2, 2014, EPA conducted a Compliance Evaluation Inspection (CEI) at the Nassau Chromium Plating CO., INC (NYU006080) SIC code 3471 located at 112-122 Second Street, Mineola, N.Y. 11501, to determine compliance with the New York State Department of Environmental Conservation SPDES Multi Sector General Permit for Stormwater Discharges. Nassau Chromium Plating CO., INC is a plating company that anodizes nickel, chrome, copper, silver, cadmium, and gold.

Upon entering the site, EPA inspectors presented credentials to the plant manager Pat Martimucci of Nassau Chromium Plating CO., INC. EPA inspectors conducted an office evaluation reviewing semi-annual compliance reports done by the Nassau county department of Public Works. Pace Analytical Laboratory was used for chemical testing of the in shop sanitary sewer floor drain. An Industrial Wastewater discharge permit for Nassau Chromium Plating CO was shown to EPA inspectors, which allows Nassau Chromium Plating CO to discharged waste water to the Bay Park Sewage treatment Plant (SPDES No. NY0026450). During the inspection, EPA was told that the facility does not have a Stormwater discharge permit associated with industrial activity. An extensive walkthrough of the facility was done by inspectors to review the industrial process of the facility. During the inspection EPA noted one drywell for stormwater in the parking lot on the western side of the facility. On site representatives informed EPA that the drywell was connected to a leeching pit. EPA inspectors saw 15 – 5 gallon and 1 – 55 gallon empty drums that were located outside the facility exposed to stormwater waiting for return/pickup. The containers were strapped to the building, uncovered and were located near the drywell (Photo DSCN3116).

During the inspection, EPA review the industrial processes inside the facility. Plating requires tank dips, and cleaning by hose spraying and further dips in stagnant tanks. EPA was informed that limited chemicals are discharged to the floor drain. When the liquid in the tanks are no longer usable, the tank is emptied into 55 gallon drums. One floor drain was located in the shop utilized by a flowing rinse, controlled by PH controller. Flowing rinse went directly into the drain, no oil water separator was installed. Flammable chemical storage lockers were located outside the painting booths. Dirty rag container, spill kits, and a hazardous storage site with secondary containment were located inside the facility. Equipment servicing lubes are stored indoors, and there is no parts cleaner onsite.

Hazardous waste storage site was located outside the facility. Site was covered and locked behind a chain linked fence. Secondary containment was used with the hazardous material.

### **POTENTIAL NONCOMPLIANCE ITEM**

1. Empty containers consisting of 5 gallon and 55 gallon drums were located outside near a storm drain. Possible residual chemicals can be washed off empty containers or knocked over which would lead to the storm drain during a rain events. Any potential exposure to Industrial Stormwater runoff is required to be permitted under the SPDES Multi-Sector General Permit for Stormwater discharges associated with industrial activity Permit No. GP-0-12-001.

### **AREAS OF CONCERN**

1. Hazardous waste storage site located outside with chain link fencing. There is possible water intrusion into the hazardous waste site during a heavy rain event causing a stormwater discharge.



## CLOSING

A closing statement was conveyed to Mr. Martimucci explaining EPA's inspection and follow up procedures. Any additional questions were answered at that time.

## ATTACHMENTS

Photograph Log  
Photographs

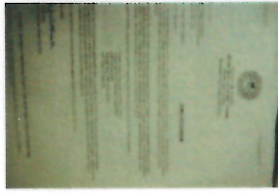
<b>PHOTO LOG:</b> Nassau Chromium Plating CO., INC 112-122 Second Street, Mineola, N.Y. 11501. Unedited Photographs taken by Chris Mecozzi, USEPA Region 2 DECA-WCB on September 2, 2014.	
Photo No.	Photograph Description
DSCN3102	Notice of violation issued by Nassau county Department of Public Works
DSCN3103	Nassau county Department of Public Works Semi-Annual compliance report (Page1)
DSCN3104	Nassau county Department of Public Works Semi-Annual compliance report (Page2)
DSCN3105	Nassau county Department of Public Works Semi-Annual compliance report
DSCN3105	Nassau county Department of Public Works Semi-Annual compliance report
DSCN3106	Nassau county Department of Public Works Semi-Annual compliance report
DSCN3107	Nassau county Department of Public Works Industrial discharge permit letter
DSCN3108	Pace Analytical Laboratory Reports
DSCN3109	Pace Analytical Laboratory Reports
DSCN3110	Nassau county Department of Public Works Industrial discharge permit letter
DSCN3111	Nassau county Department of Public Works Semi-Annual compliance report (Page1)
DSCN3112	Nassau county Department of Public Works Semi-Annual compliance report (Page2)
DSCN3113	Nassau county Department of Public Works Industrial discharge permit letter
DSCN3114	Nassau county Department of Public Works Industrial discharge permit letter
DSCN3115	Nassau county Department of Public Works Industrial discharge permit renewal letter
DSCN3116	Storm drain (1) located in yard
DSCN3117	Storm drain (1) located in yard
DSCN3118	Empty drums ready for pickup
DSCN3119	In shop floor drain leading to sanitary sewer
DSCN3120	Chemical wash off cleaning racks located in the shop above the floor drain
DSCN3121	Chemical bath tanks with residual liquids flowing toward the in shop floor drain
DSCN3122	Fenced off hazardous waste site
DSCN3123	Hazardous waste site with containers stored on secondary containment racks
DSCN3124	Hazardous waste site with containers stored on secondary containment racks



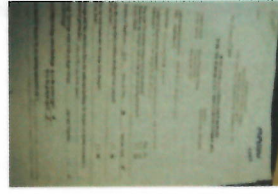
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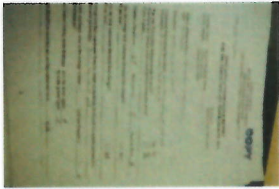
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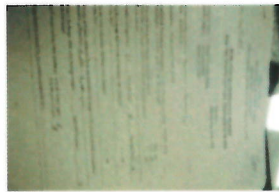
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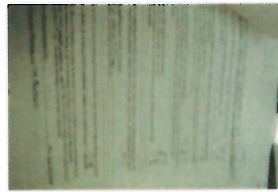
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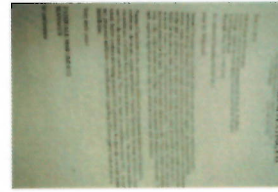
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DSCN3111.JPG



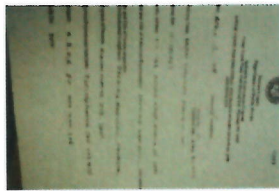
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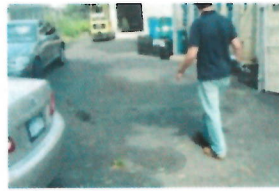
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